1. **Introduction**

This is a privacy notice issued by Anesco Limited, a company registered in England under number 07443091, whose registered office is atThe Green, Easter Park, Benyon Road, Reading, RG7 2PQ to provide information about the processing of personal data of suppliers to Anesco Limited and its group companies, which include (amongst others) Quanesco Bidco Limited, Anesco Energy Limited, Anesco Nederland B.V. and Anesco Danmark ApS (“Anesco” or “we”).

Anesco is a data "controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

This notice applies to suppliers (“you”) and explains how Anesco will collect, use or otherwise process your personal data, how we use it internally, how we share it, how long we keep it and what your legal rights are in relation to it.

“Personal data” is information relating to you as a living, identifiable individual.

It is important that you read and retain this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using that information and what your rights are under the data protection legislation.

1. **Data Protection Principles**

We will comply with data protection law, which says that the personal information we hold about you must be:

* Used lawfully, fairly and in a transparent way;
* Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes;
* Relevant to the purposes we have told you about and limited only to those purposes;
* Accurate and kept up to date;
* Kept only as long as necessary for the purposes we have told you about; and
* Kept securely.
1. **The kind of information we hold about you and how it is collected**

In the course of our relationship with you, we may obtain a range of personal data about you. This data may be received from you at the start of the relationship – e.g. through a pre-qualification questionnaire process – or during the course of our relationship, via your interactions with us and in contract-related activities.

The types of personal data that we may collect, hold, and process about you may include the following. Please note that this notice does not oblige you to provide, or mean that we will obtain, all the information listed below. The information that we obtain about you will differ depending on the nature of the services you supply to us.

* + 1. Identification information:
			- 1. Name;
				2. Contact details including address, telephone number and business/personal e-mail address;
				3. Copy of your driving licence, passport and any right to work documents, visa and other documents required to comply with checks;
				4. Passport details which may include your name, date of birth, gender, ethnicity and nationality;
				5. Information collected as part of pre-qualification questions and know your client checks, including reference checks;
				6. Your financial details, including, bank account and building society details, payroll records and tax status information.
		2. Health records:
			- 1. Details of any medical issues and/or disabilities that you have notified to us or of which we become aware during our relationship with you;
				2. Details of any drugs and alcohol testing that is carried out in relation to you (in compliance with our Drugs and Alcohol Policy).
		3. Other records:
			- 1. Details of any relevant criminal convictions or charges that we ask you to declare to us or you or your company declare to us;
				2. Details of remuneration;
				3. Location of places you have been assigned to work;
				4. Records, such as registers, of your attendance at our sites and offices;
				5. Photographs;
				6. CCTV footage;
				7. Details of incidents, including but not limited to health and safety-related incidents or incidents of which we are made aware by the police, in which you are directly or indirectly involved;
				8. Results of audits and supplier performance reviews that we carry out in relation to you; and
				9. Details of complaints made to us by members of the public in relation to you.
1. **The legal basis for processing your personal data**

To the extent that we have a contract with you (or one is in prospect), the primary legal basis for processing your personal data is that the processing is necessary for the performance of a contract with you, or to take steps at your request prior to entering into a contract with you.

Processing of your personal data may be necessary for compliance with our legal and regulatory obligations to third parties.

Further we may process your personal data in pursuit of our legitimate interests.

We may also use your personal information, typically in an emergency, where this is necessary to protect your vital interests, or someone else’s vital interests.

In a small number of cases where other lawful bases do not apply, we will process your data on the basis of your consent.

1. **The purposes for processing your personal information**

We primarily process all the categories of personal data listed in section 3 above to allow us to perform our contract with you and to enable us to comply with legal obligations. In some cases, we may use your personal data to pursue our legitimate interests. The situations in which we will process your personal information are listed below.

* + 1. Administering the contract we have entered into with you;
		2. Undertaking identification, pre-qualification and know your client checks;
		3. Undertaking audits and supplier performance reviews;
		4. Determining the terms on which you work for/with us;
		5. Paying you for the services you provide;
		6. Business management and planning, including accounting and auditing;
		7. Dealing with legal disputes involving you, or other employees, workers and contractors, including accidents at work;
		8. Ascertaining your fitness to work;
		9. Complying with health and safety obligations;
		10. Complying with our legal obligations; and
		11. To prevent fraud.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

1. **Special category personal data (“sensitive personal information”)**

Certain personal data is subject to additional safeguards under data protection legislation. Such information includes details of:

* your racial or ethnic origin;
* your political opinions;
* your religious beliefs or other beliefs of a similar nature;
* whether you are a member of a trade union;
* your physical or mental health or condition;
* your sexual life;
* the commission or alleged commission by you of any offence, or
* any proceedings for any offence committed or alleged to have been committed by you, the disposal of such proceedings or the sentence of any court in such proceedings.

In general, we will not process particularly sensitive personal information about you unless it is necessary for performance of our contract with you, to comply with a legal obligation and/or if we need to do so in order to seek confidential legal advice or establish or defend legal claims.

On rare occasions, there may be other reasons for processing, such as it is in the public interest to do so, or we may approach you for your explicit consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. Where such data is processed by us on the basis of your explicit consent, you may withdraw your consent at any time: this will not affect the lawfulness of any processing based on your consent before you withdrew it.

1. **Information About Criminal Convictions**

We may only use information relating to criminal convictions where the law allows us to do so. This is usually where that processing is necessary to carry out our obligations.

We will only collect information about criminal convictions if it is appropriate given the nature of the role and where we are legally able to do so. Where appropriate, we will collect information about criminal convictions through the Disclosure and Barring Service (DBS) or we may be notified of such information directly by you in the course of you working for/with us. We will use information about criminal convictions and offences in the following ways:

* To determine your suitability to work in roles that require access to residential property and clients; and
* To determine your suitability for roles where we are carrying out work for third parties and those third parties have stipulated that for safeguarding purposes, they will not allow workers with a criminal conviction on to the relevant site.

We are allowed to use your personal information in this way to comply with our legal safeguarding obligations.

1. **Automated Decision-Making**

We do not use automated decision-making processes with respect to you.

1. **The consequences if you decide not to provide your data**

If you decide not to supply personal data that we have requested and as a result we are unable to comply with our contractual, legal or regulatory obligations, then we may not be able to enter into, or continue, with our contact with you.

1. **Who will see or use your data and who might we share it with?**

Your personal data may be seen by our Finance, Legal, Procurement and HSEQ (Health, Safety, Environment and Quality) teams, and by members of other teams who are responsible for on-boarding new suppliers, during course of their duties. To the extent that your data is relevant to the operation of one of our sites, it may also be seen by members of the site management team or leadership team who have a need to know the information for any of the purposes set out above.

We may need to share your data with relevant third parties and other entities in the Anesco group where required by law, where it is necessary to administer the working relationship with you, where we have a legitimate interest in doing so, or where you ask us to share your data.

If our relationship with you relates to the UK Government’s Energy Company Obligation (ECO) scheme, or a similar or related scheme, we may also share your data with an energy supplier with whom we are in contract to provide credits under the ECO scheme, with the energy regulator OFGEM, or with the Association of Managing Agents.

We may also outsource some of our services or engage consultants, professional advisors and others to support us in delivering our services (for example, contractors, designated agents, auditors, trainers, courier, or IT services).

We may share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business. In this situation we will, so far as possible, share anonymised data with the other parties before the transaction completes. Once the transaction is completed, we will share your personal data with the other parties if and to the extent required under the terms of the transaction.

We might need to share your personal information in order to obtain necessary confidential legal advice or to comply with our insurance, legal or regulatory obligations. We may also need to share your personal information with a regulator or to otherwise comply with the law.

1. **Transfer of your data to other countries**

In the course of carrying out the activities referred to above we may transfer your data to other countries, which may not have the same legal protections for your data as the UK.

Where data is being transferred outside of the European Economic Area, we will take steps to ensure that your data is adequately protected in accordance with UK legal requirements. Where we are in a contractual relationship with the recipient, such protection will normally consist at minimum of appropriate contractual protections agreed between us and the recipient.

Otherwise for example we may transfer your data if it is necessary for performance of our contractual duties to you, or because we have other legal obligations to transfer the data, or it is necessary for important reasons of public interest.

If you require further detail about the protections in connection with any particular relevant transfer, matter or jurisdiction please ask us.

1. **How do we store your data?**

We will only retain your personal information for as long as necessary to fulfil the purposes for which we collected it, including for the purposes of satisfying any legal, accounting or reporting requirements.

To determine the appropriate retention period for personal data, we consider:

* The amount, nature and sensitivity of the personal data;
* The potential risk of harm from unauthorised use or disclosure of your personal data;
* The purposes for which we process your personal data and whether we can achieve those purposes through other means; and
* The applicable legal requirements.

In some circumstances, we may anonymise your personal information so that it can no longer be associated with you, in which case we may use that information without further notice to you. Once you are no longer in a supplier relationship with us, we will retain and securely destroy your personal information in accordance with applicable laws and regulations.

1. **Your rights in connection with personal information**

You have certain rights under data protection laws in relation to your personal data. This includes the right to:

1. **Request access to your personal data (commonly known as a "data subject access request")**.
2. **Request correction of the personal data that we hold about you**.
3. **Request erasure of your personal data**.
4. **Request restriction of the processing of your personal data**.
5. **Request the transfer of your personal data to you or to a third party**.
6. **Object to the processing of your personal data**.
7. **Withdraw consent at any time where we are relying on consent to process your personal data**.

Some of these rights are not automatic, and we reserve the right to discuss with you why we might not comply with a request from you to exercise them.

We do not charge a fee for you to access your personal data (or to exercise any of the other rights). However, we reserve the right to charge reasonable fees for additional copies of information that has already been supplied to you, and for requests that are manifestly unfounded or excessive, particularly where such requests are repetitive.

To exercise any of the above listed rights, please contact: 1) if you are a supplier in relation to our ECO business, Eco.communications@anesco.co.uk; 2) if you are not a supplier in relation to our ECO business, procurement@anesco.co.uk.

1. **Questions about this notice**

If you have any questions about this privacy notice or how we handle your personal information, please contact 1) if you are a supplier in relation to our ECO business, Eco.communications@anesco.co.uk; 2) if you are not a supplier in relation to our ECO business, procurement@anesco.co.uk. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO) with respect to data protection issues.

1. **Changes To This Privacy Notice and your duty to inform us of changes**

This privacy notice was last updated on 4th June 2024 and will be reviewed annually.We reserve the right to update this privacy notice at any time. We may also notify you in other ways from time to time about the processing of your personal information.

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.